## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b) Greenblatt, Lieberman, Richards & Weishoff, LLC Attn: Travis J. Richards, Esq. (TR-2556) 203 High Street Mount Holly, New Jersey 08060 Tel. (609) 267-1301 Fax. (609) 267-1305 Email Nick@WR.legal **Counsel for Bayview Court Apartments** In Re: Case No.: 22-19579 Chapter: Melissa L. Talansky 13 Hearing Date: February 14, 2023 Judge: Jerrold N. Poslusny, Jr.

## CERTIFICATION OF LANDLORD IN SUPPORT OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY

- I, Susan Yashenko, manager for Bayview Court Apartments, landlord in the above captioned case, submit this Certification in support of the Motion for Relief from the Automatic Stay.
- 1. I am fully familiar with the debtor's rental payment history because I am the landlord of the property rented by her.
- 2. The property is located at: 555 Shore Road, Apartment 161, Somers Point, New Jersey 08244.
- 3. The debtor filed for Bankruptcy on December 2, 2022.

4.	Pre-petition:
	$\mathbf{X}$ I started an eviction action in the New Jersey state court and a copy of the complaint is attached as Exhibit A, or
	☐ I did not start an eviction action.
5.	Pre-petition:
	☐ I obtained a Judgment for Possession and a copy of the Judgment is attached as Exhibit B, or
	X I did not obtain a Judgment for Possession
5.	I am seeking relief from the automatic stay to:
	☐ enforce the Judgment of Possession;
	X pursue my state court rights because of the debtor's nonpayment of rent;

- 7. The amount of the debtor's monthly rental payment is \$1,445.00
- 8. Pre-petition, the debtor owed rent totaling \$4,166.00, which represents unpaid rent for nearly three (3) months.
- 9. The debtor's post-petition payment history is as follows:

	Amount Due	Payment Due Date	Date Payment Received	<b>Amount Received</b>	How Payment Was Applied
1	\$1445.00	January 1, 2023		\$0.00	n/a

- 10. Post-petition, the debtor owes rent totaling \$1,624.50, which represents unpaid rent and charges for one (1) month.
- 11. The debtor's failure to pay rent is cause for relief from the automatic stay.
- 12. Through this motion, I request relief from the automatic stay so I may initiate or continue an action in the state court to remove debtor from the rented premises.

I certify under penalty of perjury that the above is true.

Date: January 17, 2023 /s/ Susan Yashenko
Signature of Landlord